

FILED

SEP 20 2018

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CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

LIXIONG CHEN

a/k/a John Chen,

Defendant.

CASE NO.

CR 18 0450

JD

SEALING APPLICATION AND [PROPOSED]
SEALING ORDER

UNDER SEAL

The United States hereby moves the Court for an order sealing this Motion, the Indictment, the Arrest Warrant, and the Sealing Order in the above-captioned case until the defendant is arrested. The requested sealing is reasonably necessary to protect against the potential destruction of evidence and to prevent the possible flight of the defendant.

The United States also requests that, notwithstanding any sealing order, the Clerk of Court be required to give copies of the sealed documents to employees of the United States Attorney's Office,

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Document No.

District Court
Criminal Case Processing

APPLICATION AND
[PROPOSED] ORDER

1 and that they be permitted to provide working copies to special agents and other investigative and law
2 enforcement officers of the Department of Homeland Security.

3 DATED: September 20, 2018

Respectfully Submitted,

4 ALEX G. TSE
United States Attorney

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6 
7 MICHELLE J. KANE
Assistant United States Attorney

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9 **~~PROPOSED~~ SEALING ORDER**

10 Based upon the motion of the United States and for good cause shown regarding the need to
11 protect against the potential destruction of evidence, and to prevent the possible flight of the defendant,
12 the Motion, the Indictment, the Arrest Warrant, and the Sealing Order in this case shall be sealed until
13 the defendant is arrested. Endorsed, filed copies shall be provided to the United States Attorney's Office,
14 which shall be permitted to provide working copies to special agents and other investigative and law
15 enforcement officers of the Department of Homeland Security.

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17 IT IS SO ORDERED.

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19 DATED: 9/20, 2018

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HON. KANDIS A. WESTMORE
United States Magistrate Judge